



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

NOV - 2 2016

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7014 1200 0000 6124 9728

Neal E. Barkley, P.E.
Vice President & Fertilizer Manager
Coffeyville Resources Nitrogen Fertilizers, LLC
701 East Martin Street
Coffeyville, Kansas 67337

RE: NOTICE OF NONCOMPLIANCE
Coffeyville Resources Nitrogen Fertilizers, LLC

Case Number: 16KS1207

Dear Mr. Barkley:

On December 7, 2015, a representative of the U.S. Environmental Protection Agency, Region 7 ("EPA") inspected your facility. The inspection was conducted to determine Coffeyville Resources Nitrogen Fertilizers, LLC's compliance with the requirements of the Clean Air Act, specifically with the Risk Management Program, 40 C.F.R. Part 68, which implements Section 112(r)(7), and other applicable statutes and regulations.

This letter is to notify you that the EPA has reviewed information collected during the inspection and found the following violations:

1. Facility failed to review and update the off-site consequence analysis at least every 5 years, as required by § 40 C.F.R. 68.36.
2. Facility failed to compile current written process safety information, as required by § 40 C.F.R. 68.65(a). Specifically, the Process Safety Information standard references an obsolete electrical classification diagram and the recognized and generally accepted good engineering practices documentation letter does not include all methods and standards used to ensure that all plant equipment complies with recognized and generally accepted good engineering practices.
3. Facility failed to document that the equipment complies with recognized and generally accepted good engineering practices, as required by § 40 C.F.R. 68.65(d)(2). Specifically, anhydrous ammonia piping lacked labeling and color coding, storage vessels lacked signage designating "inhalation hazard" and the vessels lacked vehicle barriers.
4. Facility failed to address emergency operations in the standard operating procedures for the UAN plant, as required by § 40 C.F.R. 68.69(a)(1)(v).
5. Facility failed to perform inspections and tests on process equipment consistent with good engineering



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practices, as required by § 40 C.F.R. 68.73(d)(3). Specifically, the pressure relief valves are replaced every six years rather than the required five years as specified in industry standard.

6. Facility failed to certify that they have evaluated compliance with the provisions of Subpart D with at least one person knowledgeable of the process during the January 2014 compliance audit, as required by § 40 C.F.R. 68.79(b).
7. Facility failed to review investigation findings with affected contractors, as required by § 40 C.F.R. 68.81(f).
8. Facility failed to document that the contractors had understood the required training, as required by § 40 C.F.R. 68.87(c)(3).
9. Facility failed to document how the facility will respond to ammonia inhalation or an ammonia burn in its Emergency Response Plan, as required by § 40 C.F.R. 68.95(a)(1)(ii).

Please forward any documentation to demonstrate that the violations mentioned above have been resolved. Types of documentation may include photographs or receipts, bills of sale, authorizations for expenditures, or paid-in-full notifications showing complete compliance.

Within thirty (30) days, please mail your response to:

Krystal Stotts
AWMD/CORP
U. S. Environmental Protection Agency, Region 7
11201 Renner Blvd.
Lenexa, KS 66219

Or within thirty (30) days, please e-mail your electronic response to:

Krystal Stotts
stotts.krystal@epa.gov

Although no further follow-up action is contemplated by the EPA at this time, please be aware that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected. Please note that penalties may continue to accrue as long as the violations remain uncorrected.

If you require more than thirty (30) days to come into compliance or have any questions regarding this report or actions that you may want to take, please contact me at (913) 551-7946 or stotts.krystal@epa.gov.

Sincerely,



Krystal Stotts
Environmental Scientist
Chemical & Oil Release Prevention Branch
Air & Waste Management Division